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*Counsel for Plaintiffs Cedric de Lisser,
Christopher Moser, and Michael Michelin, in
their capacity as the Trustees of the Cred
Liquidation Trust*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CEDRIC DE LISSER, CHRISTOPHER MOSER,)	Case No. 3:23-cv-00243-JD
and MICHAEL MICHELIN, in their capacity as)	
the Trustees of the Cred Liquidation Trust,)	
)	[Removal from Superior Court of California,
Plaintiffs,)	County of San Francisco, Case No.
v.)	CGC-22603638]
)	DECLARATION OF ANGELA J. SOMERS
LOCKTON COMPANIES LLC, d/b/a)	
LOCKTON INSURANCE BROKERS LLC,)	
a Missouri limited liability company; LOCKTON)	State Action Filed: December 22, 2022
COMPANIES, LLC- PACIFIC SERIES, d/b/a)	
LOCKTON INSURANCE BROKERS LLC, a)	Hearing Date: March 30, 2023
Missouri limited liability company; and DOES 1-)	
10, inclusive.)	Hearing Time: 10:00 a.m. Pacific
Defendants.)	

1 I, Angela J. Somers, pursuant to 28 U.S. Code § 1746, make the following declaration:

2 1. I am an attorney admitted to practice in the State of New York. I am a partner at Reid,
3 Collins & Tsai LLP, counsel to the Trustees (the “**Trustees**”) of the Cred Inc. Liquidation Trust (the
4 “**Trust**”) established in the chapter 11 bankruptcy cases of the above-captioned debtors. I am admitted
5 *pro hac vice* in this matter.

6 2. I submit this Declaration in support of the Trustees’ *Motion To Remand or in the*
7 *Alternative for Equitable Remand*, filed concurrently herewith.

8 3. I have personal knowledge of the facts set forth herein and, if called as a witness, I could
9 and would testify competently to them.

10 4. Attached hereto as **Exhibit A** is a true and correct copy of the *Order Granting the Motion*
11 *of the Trustees of Cred Inc. Liquidation Trust to Clarify the Trust’s Authority to Acquire Certain Third-*
12 *Party Claims*, entered by the United States Bankruptcy Court for the District of Delaware in Case No.
13 20-12836 (JTD), dated February 10, 2023.

14 5. I declare that the foregoing is true and correct.
15 Executed in Greenwich, Connecticut on February 17, 2023.

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17 /s/ Angela Somers
18 Angela J. Somers
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